

Darren Gibson - Re: Continuance

From: Laurence Watts <wattstrial@gmail.com>
To: Darren Gibson <darren.gibson@oag.state.tx.us>
Date: 8/30/2010 8:39 PM
Subject: Re: Continuance

Mr. Gibson,

Not a problem. I'll send you a draft before I file.

Thank you,

Kathryn Stabe
Chief Legal Assistant

On Aug 30, 2010 5:42 PM, "Darren Gibson" <darren.gibson@oag.state.tx.us> wrote:

> Kathryn,

>

> My initial reaction is that we would be willing for Plaintiff's motion
> for a 60-day continuance to be unopposed so long as you proposed a
> specific schedule that included a dispositive motion deadline 14 days
> after the end of discovery, and included a proposed amended scheduling
> order. Thus, discovery would be completed around 11/30, dispositive
> motions due around 12/14, and docket call in early February.

>

> Thank you.

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> Darren G. Gibson
> Assistant Attorney General
> General Litigation Division
> P.O. Box 12548, Capitol Station
> Austin, Texas 78711-2548
> (512) 463-2120
> (512) 320-0667 fax

>

>

>>>> Laurence Watts <wattstrial@gmail.com> 8/30/2010 3:03 PM >>>

> Mr. Gibson,

>

> Do you oppose a motion to continue all deadlines 60 days? We still need
> to
> conduct our depositions in the Palos matter and our current discovery
> deadline is September 30. Unfortunately, I do not think our calendar



> will
> allow us to squeeze in those depositions during the month of September
> before the expiration of the discovery deadline. We are preparing to
> argue
> before the 5th Circuit the first week of October and have quite a few
> other
> conflicts on the calendar. Even better if you'll agree to a joint
> motion. I
> can have it drafted and send the draft with Mr. Watts to Edith's
> deposition
> tomorrow for your signature. Please let me know what your position is.
>
> Thank you,
>
> Kathryn Stabe
> Chief Legal Assistant
>
> --
> Larry Watts
> Watts & Associates
> Civil Rights Lawyers
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> Missouri City, Texas 77459
> Telephone: 281-431-1500
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> Larry
> Watts immediately by replying to this message or contacting me at
> (281)
> 431-1500.